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## TO THE COURT, TO PLAINTIFF AND TO HER COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on June 25, 2013 (the "Petition Date"), defendant Cal-Western Reconveyance Corporation ("CWRC") filed a petition under Chapter 11 of the United States Bankruptcy Code in the Jointly Administered Bankruptcy of In re Prommis Holdings, LLC, et al., United States Bankruptcy Court for the District of Delaware, Case No. 13-10551 (BLS) (the "Jointly Administered Bankruptcy Proceeding") (the Bankruptcy Petition of EC Closing Corp., formerly known as Cal-Western Reconveyance Corp., is attached here as Exhibit A.)

The automatic stay under 11 U.S.C. § 362 remained in effect through December 19, 2013. On December 19, 2013 (the "Effective Date"), the United States Bankruptcy Court in the Jointly Administered Bankruptcy Proceeding entered an Order Approving the Disclosure Statement and Findings of Fact, Conclusions of Law, and Order Confirming the Debtors' First Amended Plan of Liquidation under Chapter 11 of the Bankruptcy Code (the "Order Confirming the Chapter 11 Liquidation Plan"). Under the terms of the Order Confirming the Chapter 11 Liquidation Plan:

as of the Effective Date, any Persons and Entities who have held, hold, or may hold Claims against or Interests in any or all of the Debtors [including CWRC], are <u>permanently enjoined</u>, on an after the Effective Date, from (a) commencing or continuing in any manner any action or other proceeding of any kind with respect to any such Claim or Interest, directly or indirectly, including indirect pursuit of any Claims against any Debtor by litigation or other claims against employees of any Debtor as of the Petition Date . . . . r Confirming Chapter 11 Liquidation Plan, para, 26, at p. 19, emphasis

(Order Confirming Chapter 11 Liquidation Plan, para. 26, at p. 19, emphasis added, a copy of which is attached here as Exhibit B.)

As of the Effective Date through the present, the continued prosecution of the instant action against CWRC is a direct violation of the permanent injunction contained in the Order Confirming the Chapter 11 Liquidation Plan.

Defendant WELLS FARGO BANK, N.A., successor by merger with Wells Fargo Bank Southwest, N.A., f/k/a Wachovia Mortgage, FSB, f/k/a World Savings Bank, FSB, erroneously sued here as Wells Fargo Home Mortgage ("Wells Fargo"), is unaware of any request by plaintiff Nahid Houman to obtain relief from the automatic stay or the permanent injunction provided for in the Chapter 11 Liquidation Plan that would allow prosecution of the instant action against CWRC.

Respectfully submitted,

ANGLIN, FLEWELLING, RASMUSSEN, CAMPBELL & TRYTTEN LLP

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WELLS FARGO BANK, N.A., successor
by merger with Wells Fargo Bank
Southwest, N.A., f/k/a Wachovia Mortgage,
FSB, f/k/a World Savings Bank, FSB,
erroneously sued here as Wells Fargo
Home Mortgage

Dated: November 9, 2015

CASE NO. \_\_\_\_\_\_CERTIFICATE OF SERVICE

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